

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

PLAINTIFF FRACTUS, S.A.

V

DEFENDANTS SAMSUNG ELECTRONICS CO., et al.

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CASE NO.: 6:09-CV-203

DEFENDANTS' HTC CORPORATION AND HTC AMERICA, INC.'S OBJECTIONS
TO PLAINTIFF FRACTUS, S.A.'S INFRINGEMENT EXHIBIT LIST

Presiding Judge: HONORABLE LEONARD E. DAVIS	Plaintiff's Attorney(s): Max L. Tribble Justin Nelson Victoria L. Cook Genevieve Vose Dan Shih Matthew Behnke Michael Heim Leslie V. Payne Micah J. Howe T. John Ward, Jr. S. Calvin Capshaw	Defendant's Attorneys: David G. Wille Rod Phelan Samir A. Bhavsar Jeff Baxter Jonathan Rubenstein Mike Jones Allen Gardner
Trial / Hearing Date(s): 05/31/11	Court Reporter: Shea Sloan	Courtroom Deputy: Rosa Ferguson

PLTF EXH. NO.	DESCRIPTION	OBJECTIONS
1	03/21/2006 U.S. Patent Number 7,015,868 B2	
2	10/17/2006 U.S. Patent Number 7,123,208 B2	
3	07/01/2008 U.S. Patent Number 7,394,432 B2	
4	07/08/2008 U.S. Patent Number 7,397,431 B2	
5	05/05/2009 U.S. Patent Number 7,528,782 B2	
6	08/12/2008 U.S. Patent Number 7,411,556 B2	
7	12/25/2007 U.S. Patent Number 7,312,762 B2	
8	03/18/2002 File History for U.S. Patent Application Number 10/102,568	
9	03/21/2006 File History for U.S. Patent Number 7,015,868	
10	10/17/2006 File History for U.S. Patent Number 7,123,208	
11	07/01/2008 File History for U.S. Patent Number 7,394,432	
12	07/08/2008 File History for U.S. Patent Number 7,397,431	
13	05/05/2009 File History for U.S. Patent Number 7,528,782	
14	08/12/2008 File History for U.S. Patent Number 7,411,556	
15	12/25/2007 File History for U.S. Patent Number 7,312,762	
16	05/04/2001 File History of PCT/ES9900296 for U.S. Patent Number 7,015,868	
17	04/24/2003 File History of PCT/EP0111914 for U.S. Patent Number 7,312,762	
18	07/02/2003 File History of PCT/EP0214706 for U.S. Patent Number 7,411,556	

PLTF EXH. NO.	DESCRIPTION	OBJECTIONS
19	05/19/1995 Spanish Patent Number 2,112,163	
20	00/00/0000 Various Fractus Prototypes	402/403, 901
21	04/19/1999 Contract between Fractus and the Polytechnic University of Catalunya	
22	03/26/1986 Regulations Regarding Patents at the Universitat Politecnica de Catalunya	802,901
23	05/07/1999 First Agreement, Second Agreement and Public Deed of Assignment of Rights, between Fractus and Francisco Moyano Carmona	
24	07/26/2010 License Agreement between Fractus and Ficosa	
25	07/23/2009 Settlement and License Agreement between Fractus and Apple	
26	03/18/2010 Settlement and License Agreement between Fractus and Motorola	
27	09/30/2010 Settlement and License Agreement between Fractus and Sharp	
28	08/03/2010 Settlement Agreement between Fractus and Sanyo	
29	12/07/2010 Settlement Agreement between Fractus and Palm	
30	11/12/2010 Settlement Agreement between Fractus and UTStarcomm	
31	09/27/2004 PR Newswire Article Frost & Sullivan Award Recognises Fractus' Expertise in Technology Innovation	402/403, 802
32	12/20/1999 - 03/30/2010 Chart re Fractus Sales Data	402/403, 901
33	00/00/2006 Article re A Multiband Antenna for Mobile Phones by H. Tamaoka, H. Hamada and T. Ueno	402/403, 802

PLTF EXH. NO.	DESCRIPTION	OBJECTIONS
34	03/00/2006 Microwave and Optical Technology Letters Article re A Folded and Bent Internal Loop Antenna for GSM/DCS/PCS Operation of Mobile Handset Applications	402/403, 802
35	08/00/2006 Microwave and Optical Technology Letters Article re Internal Folded Loop antenna with Tuning Notices for GSM/GPS/DCS/PCS Mobile Handset Applications (Maron Ex. 6)	402/403, 802
36	12/31/2000 - 12/31/2005 Fractus Statement of Income Forecast	
37	01/09/2011 Screenshot re NPD Group Profile and NPD Group Mobile Phone Track	
38	12/31/2005 Chart re Model Summary from NPD Mobile Phone Track	402/403, 901, timeliness
39	08/28/2001 U.S. Patent Number 6,281,846 B1	402/403
40	01/10/2007 Memo from C. Puente and J. Mumbru to J. Ortigosa, X. Esteve, A. Sanz, J. Anguera, E. Kim re Patent Marking of Mobile Product	402/403, 802
41	00/00/0000 Various awards and prizes awarded to Fractus Antennas	Spanish
42	05/19/2005 Email from C. Puente to A.. Algans, A. Prieto et al re 10 th Anniversary First Fractal Antenna Patent	402/403, 802
43	12/31/2006 - 00/00/2010 Non-US sales of "Interrogatory Phones" for Samsung	402/403, timeliness
44	00/00/2007 Presentation re IE3D for the Design of Planar and 3D Antennas	402/403, 611, 802, 901, timeliness
45	00/00/0000 Summary of Accused Sales by Patent/Claim Units	402/403
46	12/01/1998 Article entitled Las Antenas Fractales y el Premio Europeo a las Technologias de la Informacion (EITP '98) by C. Puente	402/403, 802, 901, Spanish

PLTF EXH. NO.	DESCRIPTION	OBJECTIONS
47	06/10/2010 U.S. Patent Application Publication 2010/014537 A1	402/403, timeliness
48	03/00/2005 LG Consumer Studies: Qualitative Study: New Model Cell Phone & Feature Evaluation. Quantitative Study: LG Electronics Feature Study (Naugler 16)	402/403, 802, timeliness
49	01/05/2007 Presentation re PEC Study - VX8600 Data (Naugler 14)	402/403, 802, timeliness
50	00/00/0000 Accused Sales by Patent/Claim (Remaining 15 Claims) for HTC	402/403, 802
51	09/00/2004-12/00/2010 Spreadsheet of Sales based on FT brand or FT PCL and sales (Richardson Ex. 19)	402/403, 802
52	11/19/2010 Richardson Electronics product web page re FR01-B3-W-0-055 Fractus Antenna Unit (Off-the-Shelf Internal Antenna for FM Band Applications) (Richardson Ex. 21)	402/403, 802
53	00/00/2007 Fractus Data Sheet re Off-the-shelf internal antenna for FM band applications, FracFM Antenna FR01-B3-W-0-055 (Richardson Ex. 22)	402/403, 802
54	02/20/2009 Richardson Electronics, Ltd. Application Note for Fractus Antenna Storage (Richardson Ex. 23)	402/403, 802
55	02/0/1999 - 04/11/1999 Figures from Multi-Level specification	402/403, 802, 901
56	03/06/2003 Email from A. Sanz to H. Moon-hwan re Antenna Test cases	402/403, 802, 901

PLTF EXH. NO.	DESCRIPTION	OBJECTIONS
57	12/23/2002 Email from F. Pena to welcomm@samsung.com re Status 2002-12-23	402/403, 802
58	07/28/2008 Patent License Contract between Fractus and Telnet	402/403
59	09/30/2003 Collaboration Agreement between Fractus and Siemens	402/403
60	09/30/2003 Annex VII: to the Agreement between Fractus and Siemens	402/403
61	07/20/2007 Letter of Intent between Fractus and InterDigital	402/403, 802
62	07/27/2007 Summary of Proposed Acquisition Terms	402/403, 802
63	09/05/2007 Summary of Proposed Acquisition Terms between Fractus and Qualcomm	402/403, 802
64	07/24/2005 License and Service Agreement between Fractus and Ficosa	402/403
65	06/09/2010 Term Sheet between Fractus and Sharp	
66	05/13/2010 Term Sheet between Fractus and Sanyo	
67	05/00/2007 Article re Antennas for Mobile Devices	402/403, 802, 901, timeliness
68	00/00/2009 Frost & Sullivan Article re North American Antenna Markets for Mobile Devices	402/403, 802, 901
69	10/01/2004 Article re An Inside Job (Wireless Week)	402/403, 802
70	03/19/2003 The Straits Times (Singapore) Article re My Mobile's good at all things - except being a phone	402/403, 802, timeliness
71	12/31/2004 - 12/31/2006 Charts re Fractus Mobile Net Revenues	
72	01/09/2011 Screenshot re NPD Group Mobile Phone Track	

PLTF EXH. NO.	DESCRIPTION	OBJECTIONS
73	02/06/2007 Memo from J. Mumbru and J. Ilario to J. Soler and T. Franco re Patent Marking of W.A. Products	402/403, 802, 901
74	12/05/2006 Memo from J. Mumbru and J. Ilario to J. Soler and T. Franco re patnet Marking of W.A. Products	402/403, 802, 901
75	07/12/2006 Memo from C. Puente and J. Mumbru to J. Ortigosa, X. Esteve, A. Sanz, J. Anguera and E. Kim re Patent Marking of Mobile Product	402/403, 802, 901
76	06/12/2006 Memo from C. Puente and J. Mumbru to J. Orgiosa, X. Esteve, A. Sanz, J. Anguera and E. Kim re Patent Marking of Mobile Product	402/403, 802, 901
77	08/27/2007 Memo from C. Puente, J. Mumbru, I. Sanz and M. Barba to J. Portabella, G. Montesinos, A. Sanz, E. Gracia X. Oliver and I. Tarruell re Patent Marking of Mobile Product	402/403, 802, 901
78	04/11/2008 Memo from C. Puente, J. Mumbru, I. Sanz and M. Marba to J. Portabella, G. Montesions, A. Sanz, E. Garcia, X. Oliver and I. Tarruell re Patent Marking of Mobile Product	402/403, 802, 901
79	07/19/2007 Memo from J. Mumbru, J. Ilario and M. Barba to J. Portabella, G. Montesinos, A. Sanz, E. Gracia, X. Oliver, I. Tarruell re Patent Marking of W.A. Product	402/403, 802, 901
80	02/06/2007 Memo from C. Puente, J. Mumbru, I. Sanz and M. Barba to J. Ortigosa, X. Esteve, A. Sanz, J. Anguera, E. Kim and A. Prieto re Product Marking of Mobile Product	402/403, 802, 901
81	06/11/2007 Presentation re Financial Projections	402/403, 802, 901
82	02/23/2007 Email from H. Mathiessen to C. Brogan, C. Puente, A. Garcia et al re Thank you	402/403, 802

PLTF EXH. NO.	DESCRIPTION	OBJECTIONS
83	10/01/1992 Letter from R. Marx, (K. Shoemaker) to B. Duvall re Confirming Antenna America's desire to work with LoJack on manufacturing antenna. (Shoemaker Ex. 3064)	402/403, 802
84	12/00/1995 Antennas America, Inc. Instruction Manual for Mobile Antennas (Shoemaker Ex. 3036)	402/403, 802
85	6/12/1996 LoJack Purchase Order re LJU Antenna Model No. TA1-US (Shoemaker Ex. 3070)	402/403, 802, 901
86	12/31/2009 Annual Report of Motorola, Inc.	
87	07/18/2010 Wall Street Journal article titled Apple Knew of iPhone Issue (Antenna Risks)	402/403, 802, timeliness
88	01/31/2007 Research Report entitled Mobile Handset Royalties Intellectual Property Rights Analysis for GSM, CDMA, WCDMA, HSDPA, LTE, WiMAX, and UMB Devices	402/403, 802, 901
89	01/00/2002 Business Plan Fractus 2002	402/403, 802
90	02/25/2004 Presentation re Antenna Basic Theory	402/403, 611, 802, 901, timeliness
91	10/01/2007 Patent License Agreement between Research in Motion and HTC	402/403
92	01/00/2007 Presentation re VX8600 PEC User Trial LG Electronics MobileComm - Market Research	402/403, 802, timeliness
93	07/00/2007 Presentation re LG Antenna Study Report	402/403, 802, timeliness
94	11/29/2004 License Agreement between Digital Wireless and LG	402/403, timeliness
95-96	NOT USED	

PLTF EXH. NO.	DESCRIPTION	OBJECTIONS
97	05/00/1997 Fractal Antennas by Carles Puente Baliarda	402/403, 802
98	11/20/1997 Paper entitled: Correction of Truncation Effect (C.E.T.) 1.2 by Jordi Romeu, Monica Navarro, Carles Puente, Jordi Berenguer	402/403, 802
99	04/02/1998 Paper entitled: Adjustment of Input Impedance. P2/3SPK Dual Monopole 1.6 by Jordi Romeu, Monica Navarro, Carles Puente, Jordi Berenguer	402/403, 802
100	05/28/1998 Paper entitled: Monopolo Dual Aplicacion Microcelula Fractus II 1.7 by Jordi Romeu, Monica Navarro, Carles Puente, Jordi Berenguer	402/403, 802, Spanish
101	04/08/2005 Quality System Instructions	802
102	10/13/2005 Procedimientos Del Sistema De Calidad	402/403, 802, timeliness, Spanish
103	00/00/00 CD re Richardson Electronics Point of Sale	402/403, 802, 901
104	00/0/2010 IE3D™ IE3D User's Manual Release 15.0	402/403, 802, 901, timeliness
105	00/00/2010 Presentation re Mentor Graphics Applications of IE3D™ in Designing Planar and 3D Antennas Release 15.0	402/403, 802, 901, timeliness
106	00/00/0000 Manual HFSS Online Help	402/403, 802, 901, timeliness
107	03/16/2007 Email from E. Hinojo to R. Nogue re Samsung Chorus	402/403, 802, 901
108	00/00/0000 Samsung Purchase Order for Intenna-SGHT-709; ACQ-083; SGH-T709, 824	402/403, 901
109	00/00/1994 Term Project entitled Fractal Design of Multiband Antenna Arrays by Carles Puente Baliarda	402/403, 802
110	Physical Exhibits of Defendant phones re HTC	901
111	Defendant Antenna files re HTC	

PLTF EXH. NO.	DESCRIPTION	OBJECTIONS
112	Measurements of Defendant Antennas re HTC	402/403, 802, 901, timeliness
113	Geometrical Analysis of Defendant Antennas re HTC	402/403, 802, 901, timeliness
114	User Manuals of Defendant phones re HTC	402/403
115	11/01/2007 Email from H. Mattheissen re Aerial exclusivity	402/403, 802
116	05/12/2007 Email from H. Mattheissen to R. Bonet, C. Puente et al re Qualcomm Update	402/403, 802

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on April 17, 2011. This document was served on all counsel of record by electronic mail on April 16, 2011.

By: /s/ David G. Wille
David G. Wille